

IN THE UNITED STATES DISTRICTCHARLESTON DIVISION

MR. MITCHELL SUMPTER,  
MR. CHRISTOPHER BONDS,  
MR. JASON BRATTON  
MR. JANARR JONES  
MR. CORNELIUS GARY  
MR. Cedric Brockington

V.S.

LEEDSBORO COUNTY Detention Center,  
A. LANE Cribb, Sheriff of Leedeboro  
COUNTY, Michael A. Schwartz,  
Administrator, MAJOR MARTON, CAPT.  
WINE GLASS, LT. ANDERSON, SGT. HARRISON,  
LT. CLARET, Southern Health Partners,  
NURSE CONNIE, NURSE DOREAD, DR. REYES,  
CHAPLAIN WILLIAMS, Food Supervisors, WALKER,  
ALL MAINTENANCE STAFF, ALL IT, ALL SGTs,  
ALL CORPALS, all officers, ECT AL. ALL IN  
THEIR INDIVIDUAL CAPACITY, & OFFICIAL CAPACITY,  
Defendants

NOTICE OF MOTION  
FOR EMERGENCY  
COURT PURSUANT TO  
THE FEDERAL RULES  
OF CIVIL  
PROCEDURES &  
SWORN AFFIDAVITS

RECEIVED CLERK'S OFFICE  
2014 JAN 13 A 10:00  
DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA

HEREBY, MITCHELL LEE SUMPTER AND THE ABOVE  
PLAINTIFF/DETAINEE'S, MOVES BEFORE THIS  
HONORABLE COURT PURSUANT TO THE FEDERAL  
RULES OF CIVIL PROCEDURES BY WAY OF  
MOTION OF EMERGENCY COURT & SWORN  
AFFIDAVITS. THIS HONORABLE COURT HAS JUDICIAL  
DUTIES TO INTERVENE & SECURE THE SAFETY OF  
ONE'S "DETAIN"; WHO'S BELIEVED TO BE DENIED  
HIS/HER HUMAN RIGHTS, PROTECTED BY THE  
UNITED STATES CONSTITUTIONS. 1st AMEND,  
8th AMEND, 14th AMEND, 18th AMENDMENT & ECT. THAT  
FOLLOWS;.. DETAINEE'S ALSO SEEK REFUGE FROM



THE GEORGETOWN COUNTY DETENTION CENTER & OR IMMEDIATE RELEASE FROM ALL CRIMINAL PARTICULARS/CRIMES AS SOLE/SAID BY THE STATE OF SOUTH CAROLINA [COUNTY] [MUNICIPALITY] & OR OTHERWISE GEORGETOWN, SOUTH CAROLINA.. THIS HONORABLE COURT IS THE ONLY REMEDY & THIS MOTION FOR EMERGENCY COURT IS THE ONLY REMEDY FOR IMMEDIATE APPROACH FOR THE DANGERS OF MALICE & CALLOUS CALLINGS FROM MITCHELL SUMPTER & OTHER **DETAINEES** held CAPTIVE AT GEORGETOWN COUNTY DETENTION CENTER.. **DETAINEES** SOLEY BELIEVE & ARE IN HIGH HOPES & FAITH THAT THIS HONORABLE COURT WOULD, "WILL" WITHOUT A DOUBT INTERVENE & SECURE THEIR SAFETY FROM A LIVING GERMINATE DISEASE, COMMONLY KNOWN & CALLED "BLACK MOLD",... SUCH DISEASE <FUNGUS> IS REPORTIVELY KNOWN TO CAUSE RESPIRATORY disfunction & IF NOT TREATED IN A TIMELY MANNER; MAY CAUSE OTHER HUMANLY DISFUNCTIONS &/OR DEATH...

MITCHELL SUMPTER & **DETAINEES** ARE ENTITLED TO FULL PROTECTION UNDER THE UNITED STATES CONSTITUTIONS, THEREFORE MITCHELL SUMPTER &



EACH DETAINEE ARE SEEKING FULL Protection From Retaliation by way of STATE officials, County officials, Government officials, City officials or any official whom is acting under the color & creed govern by our CONSTITUTIONAL RIGHTS.. THAT EACH DEFENDANT shall be held Responsible in his/her Individual Compacity & official compacity.. MITCHELL SUMPTER & DETAINEES ARE NOT CAPABLE to afford LEGAL Representation & seek counsel assistance appointed by the COURT.. ALSO seek Prompt Medical Attention, Fair Housing, PROPER FEEDING FREE FROM THE "BLACK MOLD" DISEASE, APPOINTED PSYCHIATRIST BY THE COURT & MITCHELL SUMPTER & EACH DETAINEE MENTION HEREWITHIN SEEK PHYSICAL DAMAGES OF \$2,500.00 "TWENTY FIVE HUNDRED DOLLARS" PER EACH 24 hour DAY SPENT in such contaminated ENVIRONMENT, \$1,000,000.00 "ONE MILLION DOLLARS" FOR FUTURE ILLNESS THAT MAY ACCRUE TO BE SPREAD TO FAMILY, FRIENDS, FOLKS & OTHERS, THAT SUCH FUNDS BE USED FOR TREATMENTS & RECREATION PURPOSES ECT, \$1,000,000.00 "ONE MILLION DOLLARS" FOR THE MENTAL ANGUISH SUFFERING & THAT SUCH SUMS ARE TO BE PAID TO MITCHELL SUMPTER, & EACH DETAINEE SEPARATELY IN THE FULL AMOUNT MENTION HerewithIN .....



SWORN AFFIDAVIT

1. MY NAME IS MITCHELL LEE SUMPTER
2. THAT I AM BEING HOUSED AT THAT GEORGETOWN COUNTY DETENTION CENTER,
3. THAT I AM HOUSED IN A CAGE & A DIRT ENVIRONMENT FOR MEDICAL & PROTECTIVE DETAINEES,
4. THAT I HAVE SERVAL CRACKED RIBS & ONE BROKEN RIB, THAT MY BACK IS MESSED UP & MY FINGERS ARE BROKEN & I HAVE A DYSFUNCTIONAL KIDNEY, THAT I SUFFER FROM B.I. POLAR MIX-DISORDER & SUICIDAL, I HEAR VOICES & HAVE PANIC ATTACKS,
5. THAT I'VE BEEN HAVING HEADACHS, CHEST PAINS, ITCHES IN MY THROAT, SNEEZES THROUGHOUT THE DAY & NIGHT, ITCHES ALL OVER MY BODY, & FRIGHTMARES,
6. THAT I'VE NOTICE THAT THIS GEORGETOWN COUNTY DETENTION CENTER IS INFESTED WITH BLACKMOLD, MILDEW,
7. THAT TODAY JAN. 2ND, 2014 I WAS TAKEN TO MEDICAL TO HAVE BLOOD DRAWING BY NURSE CONNIE & TO BE SEEN BY DR. COLLEY & THERE IN MEDICAL IN PLAIN EYE VIEW IS STRAKS OF BLACKMOLD OVER THE WALLS & CEILINGS.
8. THAT I AM AFRAID FOR MY LIFE, BECAUSE I LIVED ON MYRTLE BEACH & IF A MOTEL OR HOTEL HAS BEDBUGS OR BLACKMOLD

IT IS AGHAST & IS AUTOMATICALLY "CONDEMNED"  
CLOSED & TORN DOWN BY THE CITY..

9. THAT THE STAFF HERE ARE TOTAL AWARE OF  
OF THIS OUTBREAK OF LIVING FUNGUS DISEASE,  
THAT AT TIMES THEY SPRAY BODY COLOGNES &  
PERFUMES TO COVER UP THE ODOROUS SMELL OF  
MILD DEW FROM THE BLACKMOLD..
10. THAT I'VE WROTE TO SEVERAL STAFF MEMBERS  
ABOUT THIS FUNGUS APON GRIEVANCES & REQUEST  
FORMS YET I'VE NOT RECEIVED A RESPONSE, FROM  
CAPT. WINE GLASS, A. LANE CRIBB, DR. REEVES,  
& MICHAEL A. SCHWARTZ
11. THAT I AM AFRAID IF I LIVE THROUGH THIS ORDEAL,  
THAT I MAY SPREAD THIS FUNGUS TO MY CHILDREN &  
FAMILY.
12. THAT THE FOOD HERE AT GEDC. IS BEING SERVED  
COLD & ON RUBBER LIKE PLASTIC TRAYS THAT WERE  
BANNED BY DHEC & NEVER IN A HOT BOX, THEREFORE  
I AM EATING THIS LIVING FUNGUS.
13. THAT MYSELF & OTHER DETAINEES HAVE GATHERED UP  
FACTUAL EVIDENCE OF THIS BLACKMOLD/MILD DEW IN  
DUE RESPECT TO PROVE OUR CLAIM TO THIS  
HONORABLE COURT & WE SEEK IMMEDIATE RELIEF,  
JUDGEMENT IN OUR FAVOR ON ALL GROUNDS.
14. THAT I MITCHELL LEE SUMPTER #248-47-7501,  
SWEAR UNDER OATH THAT THE ABOVE IS THE  
TRUTH TO THE BEST OF MY KNOWLEDGE ON  
THIS MONTH JAN. DAY AND YEAR 2014..



CAUTION

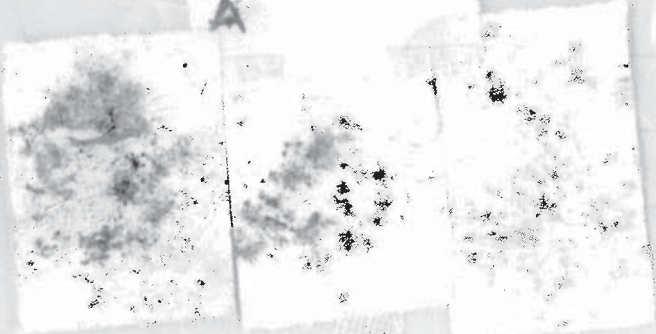
BLACK MOLD

C-UNIT

GEORGETOWN  
COUNTY DETENTION  
CENTER

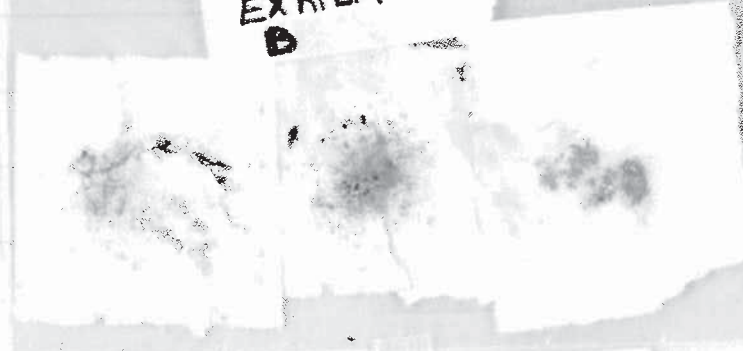
SAMPLES  
CAGE-3-  
EXHIBIT

A

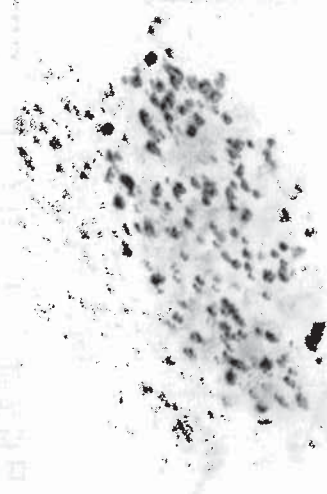


SAMPLE  
CAGE-1-  
EXHIBIT

B



SAMPLE  
DAY ROOM  
B



SAMPLE  
DAY ROOM  
C TABLE



SAMPLE  
CAGE 2  
EXHIBIT

C



To U.S. District Court  
85 Broad Street  
Charleston S.C.  
29401

JAN 7<sup>th</sup> 2014

RECEIVED CLERK'S OFFICE  
2014 JAN 13 A 10:00  
DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
JAN 13 2014

To Whom It May Concern:

Please take Notice that enclosed is/ARE  
THE ORIGINAL DOCUMENTS WRITTEN BY THE  
DETAINEES HOUSED AT GEORGETOWN COUNTY DETENTION  
CENTER, NOTICE OF EMERGENCY COURT  
SWORN AFFIDAVITS BY EACH DETAINEE  
EVIDENCE OF BLACK MOLD  
EXHIBIT (A) (B) (C) DAY ROOM (B) & (C)

DETAINEES ARE REQUESTING THAT THIS HONORABLE  
COURT WOULD FORWARD EACH DETAINEE COPIES  
OF ALL WHICH IS FORWARDED TO THE COURT. DUE TO  
FEAR OF RETALIATION & DESTROYING OF SUCH  
LITIGATION, DETAINEES FEARED REQUESTING  
FOR COPIES.

Also Detainee, Mitchell Sumpter's 248-477501  
NOTICE OF EMERGENCY COURT & SWORN AFFIDAVIT WHICH  
IS AN SEPARATE SUIT NO<sup>th</sup> PAGES 1 of 5

Mitchell Sumpter  
2394 BROWNS FERRY RD.  
GEORGETOWN, S.C. 29440

Mr. Mitchell Lee Sumpter  
2394 Browns Ferry Rd.  
Georgetown, S.C. 29440



ITEM X-RATED  
BY USMS  
1-13-14  
PS

U.S. DISTRICT COURT  
85 BROAD STREET  
CHARLESTON, SOUTH CAROLINA  
29401

RECEIVED CLERK'S OFFICE  
2014 JAN 13 A 10:00  
DISTRICT COURT  
CHARLESTON, SC



Georgetown County Detention  
Center will Not Accept or  
Send any Mail Containing  
Gang-Related Material.

GEORGETOWN COUNTY DETENTION CENTER  
MICHAEL A. SCHWARTZ - ADMINISTRATOR

THE GEORGETOWN COUNTY DETENTION CENTER  
HAS NEITHER CENSORED NOR INSPECTED THIS  
ITEM. THEREFORE, THE DETENTION CENTER  
IS NOT RESPONSIBLE.



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

MITCHELL Sumpter

[Enter the full name of the plaintiff in this action]

Civil Action No. 8-14-180-JFA-JDA  
(to be assigned by Clerk)

COMPLAINT  
State Prisoner

v.

Georgetown County Detention Center

ET AL

In Their Individual Capacity And  
Official Capacity

TRIAL BY JURY

[Enter above the full name of defendant(s) in this action]

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USDC, CLERK GREENVILLE, SC  
2014 MAR -6 AM 11:38

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise related to your imprisonment? Yes \_\_\_\_\_ No ☒

B. If your answer to A is Yes, describe the lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.

1. Parties to this previous lawsuit:

Plaintiff: N/A

Defendant(s): N/A

2. Court: N/A

(If federal court, name the district; if state court, name the county)

3. Docket Number: N/A

4. Name(s) of Judge(s) to whom case was assigned: N/A

5. Disposition: N/A

(For example, was the case dismissed? Appealed? Pending?)

6. Approximate date of filing lawsuit: N/A

7. Approximate date of disposition: N/A



CA NO<sup>8</sup> 8-14-180-JFA-JDA

## II. PLACE OF PRESENT CONFINEMENT

- A. Name of Prison/Jail/Institution: GEORGETOWN COUNTY DETENTION CENTER
- B. What are the issues that you are attempting to litigate in the above-captioned case? CRUEL & UNUSUAL PUNISHMENT / FIRE & SAFETY HAZZARD / POLLUTION
- C. (1) Is there a prisoner grievance procedure in this institution? Yes ☒ No ☐
- (2) Did you file a grievance concerning the claims you are raising in this matter? Yes ☒ No ☐
- When DEC. 2013 / JAN. 2014 Grievance Number (if available) NA
- D. Have you received a final agency/departamental/institutional answer or determination concerning this matter (i.e., your grievance)? Yes ☐ No ☒
- E. When was the final agency/departamental/institutional answer or determination received by you? NA
- If possible, please attach a copy of your grievance and a copy of the highest level decision concerning your grievance that you have received.*
- F. If there is no prison grievance procedures in this institution, did you complain to prison, jail, or institutional authorities? Yes ☒ No ☐
- G. If your answer is YES:
1. What steps did you take? WROTE GRIEVANCES TO CAPT. WINEGLASS & TO OTHER STAFF
  2. What was the result? NO RESPONSE APOON GRIEVANCES / BUT DID RECEIVE MY CELL WIPE.

## III. PARTIES

*In Item A below, place your name, inmate number, and address in the space provided. Do the same for additional plaintiffs, if any.*

- A. Name of Plaintiff: MITCHELL Lee Sumpter Inmate No.: \_\_\_\_\_
- Address: Georgetown County Detention Center 2394 Browns Ferry Rd. Georgetown SC. 29440

*In Item B below, place the full name of the defendant, his official position, and place of employment in the space provided. Use Item C for additional defendants, if any.*

- B. Name of Defendant: Georgetown County Detention Center Position: \_\_\_\_\_
- Place of Employment: Georgetown County Detention Center 2394 Browns Ferry Rd. Georgetown SC. 29440
- C. Additional Defendants (provide the same information for each defendant as listed in Item B above):
- A. LANE Cribb, Sheriff of Georgetown County
- 430 NORTH FRASIER STREET Georgetown, SC. 29440
- See Attached sheet →



CONTINUED III parties 'C'

MAJOR MORTON  
Capt Wine glass

C/A no

8-14-CV-180-JFA-JDA

1<sup>st</sup> Sgt Wragg

1<sup>st</sup> Clarey

lt Anderson

Sgt Harris

Sgt Harrison

sgt Dryer

sgt Williams

off Poincet

off manor

off Gibbs

off Oliver

off Perez

Nurse Connie

Nurse Doreen

Cheif Schwartz

off Robinson

off Matthews

off Washington

Sargent Feeter

Chaplain Williams

Mr Walker (Kitchen Supervisor)

Mr Martin (Maintenance)

Dr Reeves

Georgetown County Detention Center  
2394 Browns Ferry RD.  
Georgetown SC. 29440



## IV. STATEMENT OF CLAIM

C/A NO. 8-14-180-JFA-JOA

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach an extra sheet if necessary.

- (1) ON NOV. 29<sup>th</sup> 2013 I WAS TRANSFER FROM MYRTLE BEACH JAIL to Georgetown County Detention Center for several charges, AND which I WAS PLACED IN A medical Protective custody unit C-3 (2) THAT I BEGAN to ITCH, HAVE HEADACHES, CHEST PAINS, NOSE BLEEDS, SHORTNESS OF BREATH, & I REPORTED my complaints to Medical who DENIED me ANY treatment. (3) THAT I WROTE TO STAFF, YET I DID NOT RECEIVE ANY RESPONSE, BUT I COMPLAINED SO MUCH THAT ONE OFFICER MANOR SENT AN INMATE WORKER TO MY CELL ON JAN. 14, 2014 WHO ONLY WIPE A SPOT OFF THE CEILING. (4) THAT I COMPLAINED TO MY CELL MATE & HE TOLD ME THAT I WAS BREATHING BLACK MOLD, AND THAT EVERY OFF. HERE AT G.C.D.C. KNEW ABOUT THIS GERM BUT THEY WENT GONE TO DO NOTHING. (5) AS THE DAYS PASS ALL I WOULD DO WOULD FEEL SAD & DOWN BECAUSE THIS BLACKMOLD IS EVERYWHERE, IN OUR DAY ROOM → GROWING THROUGH THE BLOCKS, ON OUR DAY ROOM DINNER TABLE, OVER THE CEILING. I WOULD BECOME AFRAID TO EAT OUT THE TRAYS BECAUSE THEY ARE RUBBER & HELD WATER INSIDE THEM. (6) I SOME TIME COULD NOT SLEEP DUE TO MY FRIGHT, & I BECAME VERY DEPRESS. (7) AGAIN I WENT TO MEDICAL TO SEE A MENTAL HEALTH DOCTOR & I TOLD HIM ABOUT THIS ISSUE & I SHOWED HIM THE BLACK MOLD IN THE MEDICAL UNIT. THIS WHERE THE NURSES DRAW OUR BLOOD WITH NEEDLES & TREAT US MOSTLY, "I COULD NOT



C/A' No# 8-14-180-JFA-JDA

## IV. STATEMENT OF CLAIM - continued.

Believe THAT MEDICAL would Allow A Known LIVING Germ  
 visible To The EYES to exist in the medical ward!  
 (8) THAT I AM being violated by cruel & unusual Punish-  
 ment 8<sup>th</sup> Amendment, 14<sup>th</sup> Amendment because I am  
 A Citizen & I AM being deprived of Life & Equal  
 Protection of the Laws of 18<sup>th</sup> & 11<sup>th</sup> Amendment (9)  
 THAT EACH Official Named in this 1983 is working  
 under the color & code of this S.C. STATE in U.S.A. &  
 should be held accountable for my Fears & Safety. (10)  
 THAT IT IS extremely hard for me & other Detainees  
 to Address court issues & know what we are being  
 held in Jail for because we are being denied  
 proper Access to the courts. There is NO Legal  
 CART which carry the (code ANN) (U.S. Titles) (Federal  
 & State Laws). We CAN NOT write A staff Here At  
 G.C.D.C. AND ASK for any kind of reference concerning  
 A Legal CASE LAW to assist us with A case, Yet  
 we CAN ONLY write Capt. Wineglass who will Try to  
 find us certain things on the computer. A reference  
 CART OR Law Library Reference Room is very much  
 more effective to assist & should be A number  
 #1 in ANY county Jail & should be essential to  
 Georgetown County Detention Center beings that  
 Georgetown county only have two (2) public  
 Defenders to Represent thier entire county. Housing  
 over 200 detainees → Forcing Detainees to plea Guilty  
 by Lack of knowledge of Law & Violation of Article 21 of the const..



## V. RELIEF

C/A NO<sup>#</sup> 8-14-180-JFA-JDA

State briefly and exactly what you want the court to do for you.

This Detention Center (G.C.D.C.) should be Torn Down for its Black-Mold Out Break. That there should be a Legal cant/visa Law Library for all Detainees in G.C.D.C.. That I should be tested & treated for the inhaling of this Germ. That I should be treated by a mental Doctor for my fears.

THAT for each Day Held at G.C.D.C. I should receive \$2,500.00 Twenty Five Hun. Dollars Each Day Forced to live under these physical conditions; \$2,500.00 Twenty Five Hun. Dollars for each Day I've been mentally challenged by the Blackmold & for my mental Anguish. 1 million Dollars for my Pain & suffering (1,000,000.00) AND 2 million Dollars for Punitive Damages.

Plaintiff is also requesting Declaratory Judgment by Right of Law his (Access to the courts) & by Physical Evidence of the Black mold which violates Detainee Rights free from cruel & unusual punishment and should be Granted Summary Judgment on all Issues Raised & each & every claim herein should be taken AS A matter of Law AS True/contrue; Also Detainee SEeks Release from the conditions of his confinement ASAP. - M.L.S

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 3rd day of March, 20 14.

Mitchell Singson M.L.S.

Signature of Plaintiff



# Georgetown County Detention Center

## ACCOUNT SUMMARY

**Inmate ID:** ~~██████████~~  
**Inmate Name:** MITCHELL LEE SUMPTER  
**Inmate Location:** ~~G-BLOCK C3~~ H8  
**Report Date:** 2/4/2014

Date	Amount	Description	Comment
12/18/13	-1.00	Medical (400301)	
12/15/13	-2.00	Medical (400301)	Repaying inmate debt
12/15/13	-4.00	Medical (400301)	Repaying inmate debt
12/15/13	7.00	Kiosk Cash Holding Account (1001)	
Total:	0.00		

Total medical transactions \$7.00

MITCHELL SUMPTER  
G.C.D.C. F-5  
2394 BROWNS FERRY R.D.  
GEORGETOWN, S.C. 29440

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CLERK'S OFFICE

UNITED STATES DISTRICT COURT  
300 E. WASHINGTON ST., RM 239  
GREENVILLE, S.C. 29601

FILED  
MAR 3 2014  
USDC  
GREENVILLE, SC



MITCHELL Sumpter  
G.C.D.C F-5  
2394 Browns Ferry R.D.  
Greenville, S.C. 29440

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UNITED STATES DISTRICT COURT  
300 E. Washington St, Rm 239  
Greenville, S.C. 29601

Signature [Signature] Date 3-6-14



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